

Hearing Date: 2/23/2022 9:30 AM
Location: Court Room 2208
Judge: Trevino, Daniel A

FILED
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IRIS Y. MARTINEZ
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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

MARTHA RICHARDSON,

Plaintiff,

v.

NATIONAL RAILROAD PASSENGER
CORPORATION d/b/a AMTRAK,

Defendant.

Case No.: 2021L012806

COMPLAINT

Plaintiff, Martha Richardson, by her attorney, Law Office of Karen C. Lee, for her
Complaint against the Defendant, National Railroad Passenger Corporation d/b/a Amtrak, states
as follows:

1. At all relevant times stated herein, the Defendant, National Railroad Passenger Corporation d/b/a Amtrak (hereafter Amtrak), was a corporation doing business in the City of Chicago, County of Cook, State of Illinois.
2. On or about December 28, 2019, Defendant Amtrak, owned, managed, operated, maintained, and controlled, both directly and indirectly, individually and through its agents, servants, and/or employees, passenger trains which arrived at and departed from Union Station in the City of Chicago, County of Cook, State of Illinois.
3. On or about December 28, 2019, Plaintiff was a lawful passenger completing a connection from one of Defendant's trains to another of Defendant's trains on the premises of Union Station in the City of Chicago, County of Cook, State of Illinois.
4. At all times relevant to this Complaint, Plaintiff identified herself to Defendant as an adult passenger with reduced mobility.



FILED DATE: 12/23/2021 10:47 AM 2021L012806

5. At the aforesaid time and place, Defendant Amtrak, individually and by and through its agents, servants and/or employees, owed a duty to exercise the highest degree of care in the ownership, operation, control and maintenance of its passenger trains and premises so that its passengers, including Plaintiff, were not injured and, further, not to create or allow any dangerous conditions to exist so as to protect its passengers, including Plaintiff, from injury.

6. At the aforementioned time and place, Defendant, Amtrak, was guilty of one or more of the following careless and negligent acts and/or omissions, in that it:

- a. Failed to provide Plaintiff with baggage assistance in accordance with its policies and procedures;
- b. Failed to inform the appropriate personnel of the necessity of a Red Cap Service;
- c. Failed to remain with Plaintiff until the Red Cap Service arrived to secure safe transfer of her baggage, belongings and service animal and to prevent injury;
- d. Failed to provide Plaintiff with Red Cap Service in accordance with its policies and procedures;
- e. Failed to fulfill its commitment to offer passengers with disabilities, including Plaintiff, with Red Cap Service to assist with baggage to and from their trains, navigate the station and provide general assistance, in accordance with its policies and procedures; and
- f. Failed to fulfill its commitment to the public to ensure that all customers, including those with disabilities, are provided with quality customer service and everything necessary to make their trip safe and enjoyable.

7. As a direct and proximate result of one or more of the foregoing acts and/or omissions by Defendant, Amtrak, Plaintiff sustained injuries when she was caused to maneuver her luggage, belongings, service animal and service animal's food and necessities unassisted in attempt to arrive to her connecting train.

8. As a further and direct result of the negligent acts and/or omissions of the Defendant, Amtrak, Plaintiff suffered great pain and injury, and loss of a normal life, and incurred medical expenses.

WHEREFORE, Plaintiff, Martha Richardson, prays that this Court enter its judgment

against the Defendant, National Railroad Passenger Corporation d/b/a Amtrak in an amount in excess of the jurisdictional limits.

LAW OFFICE OF KAREN C. LEE

By:



Attorney for Plaintiff

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FILED DATE: 12/23/2021 10:47 AM 2021L012806